

FILED**JUNE 30, 2008**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTIN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS, EASTERN DIVISION.**CDY**
PLAINTIFF'S EMERGENCY MOTION TO AMEND THEIR ORIGINAL
COMPLAINT PURSUANT TO A STANDING ORDER OF THE DISTRICT COURT.DR. RABBI K. A. ISRAEL, A/K/A/
DR. RABBI K. GARTH RICHARDSON,
THE BROTHER OF, AND SURROGATE
DECISION MAKER FOR,
MS. BEATRICE DEMETRICE GARTH,
A PLAINTIFF AND A DISABLED PERSON,
P.O. BOX 803241,
CHICAGO, ILLINOIS, 60680-3241
TELEPHONE: (773)-469-8207
_____) NOTICE OF THE PLAINTIFFS' CLAIM
) OF THE UNCONSTITUTIONALITY
) OF A STATUTE OF THE STATE OF
) ILLINOIS AND OF THE COUNTY OF
) COOK, _____
) CIVIL ACTION NO. 07-CV-07084
) _____
) HON. JUDGE C. R. NORGLE, SR.,
) HON. MAG. JUDGE A. KEYS.
) _____

PLAINTIFFS,

) DAMAGES CLAIMED: \$100,000,000

VERSUS

CIRCUIT COURT OF COOK COUNTY, ILL.,)
DOROTHY BROWN, CLERK OF THE CIR. COURT,))
MICHAEL S. DELANEY, ATTORNEY AT LAW,)
ETHEL MAE SPENCER,)
ERNESTINE ALLEN,)
ELVIE NELSON GARTH,)
LISA MADIGAN, ATTORNEY GENERAL OF ILL.,)

DEFENDANTS,

(5.)

A COMPLAINT CHARGING THE STATE OF ILLINOIS, THE CIRCUIT COURT OF THE COUNTY OF COOK, ET AL. DEFENDANTS, WITH WANTON MISCONDUCT, THE UNCONSTITUTIONAL ESTABLISHMENT, AND THE UNCONSTITUTIONAL ENFORCEMENT, OF A STATE RELIGION, AS A REQUIREMENT TO PARTICIPATE IN FEDERALLY FUNDED PROGRAMS, AND CHARGING SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF ART. (III) ss (2), ART. (IV) ss (1) & CLAUSE (1) OF ss (2), ART. (VI) PARA. (2) & (3), AMEND. (I), (IV), (V), (VI), (VII), (VIII), (IX), (X), (XIII) ss (1), (XIV) ss (1), (XV) ss (1), ET AL., OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA, AND CLAIMING DAMAGES FROM THE DEFENDANTS BECAUSE OF THEIR HAVING CAUSED PHYSICAL INJURIES, MEDICAL TRAUMA, AND EMOTIONAL DISTRESS, THEREBY UPON THE PLAINTIFFS.

COMES NOW THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND HIS SISTER AND WARD, PLAINTIFF MS. BEATRICE DEMETRICE GARTH, A PERSON WITH A DISABILITY, TO PRAY FOR LEAVE OF THE COURT TO FILE THEIR AMENDED EMERGENCY COMPLAINT IN THE INSTANT ACTION UNDER, AND PURSUANT TO F.R.C.P. 15(a)—(d).

IN FURTHERANCE OF SAID PRAYERS FOR LEAVE OF THE COURT, AND AS ADDITIONAL GROUNDS FOR, AND IN SUPPORT OF, PLAINTIFF'S EMERGENCY MOTION TO AMEND THEIR ORIGINAL COMPLAINT, PLAINTIFFS STATE:

- (1.) THIS PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND, MS. BEATRICE D. GARTH, CHARGES VIOLATIONS OF TITLE XIV: STATE PLANS FOR AID TO THE**

(6.)

PERMANENTLY AND TOTALLY DISABLED; SECTION 1402(a)(1), ss 1402(a)(10), (a)(11), (a)(12), AND ss 1402(b)(1), AND ss 1402(b)(2), OF THE SOCIAL SECURITY ACT, INCLUDING, WASTE, FRAUD, ABUSE, AND MISAPPOPRIATION OF FEDERAL MONIES (20 ILCS 2310/2310-65), AGAINST THE OFFICES OF THE STATE OF ILLINOIS OFFICIALS, AND AGAINST THE COUNTY OF COOK OFFICIALS, INCLUDINDING ATTORNEY MICHAEL S. DELANEY, AND ATTORENEY STEVEN MIJALOVIC, NAMED IN THIS COMPLAINT.

- (2.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE D. GARTH, CLAIM THE UNCONSTITUTIONALITY OF THE "EXEMPT FROM THE PROVISIONS OF THE FREEDOM OF INFORMATION ACT" CLAUSES OF (20 ILCS 2310/2310-140),**
- (3.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE D. GARTH, CLAIM THE UNCONSTITUTIONALITY OF THE "IMMUNITY FROM CIVIL LAWSUIT" CLAUSE OF (225 ILCS 60/7(J)) MEDICAL PRACTICE ACT OF 1987.**
- (4.) THE PLAINTIFF'S DR. RABBI K. A. ISRAEL, AND MS. BEATRICE DEMETRICE GARTH, CLAIM THE UNCONSTITUTIONALITY OF (225 ILCS 60/6) THE MEDICAL PRACTICE ACT OF 1987, AND PARAGRAPHS (h) AND (i) SECTION (6) OF ARTICLE (VII) OF THE ILLINOIS CONSTITUTION OF 1970.**
- (5.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE D. GARTH, CHARGE THE OFFICES OF DANIEL E. BLUTHHARDT: DIRECTOR OF THE OFFICE OF FINANCIAL AND PROFESSIONAL REGULATIONS WITH CONTINUING SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF**

(7.)

(20 ILCS 2310/2310-185) CIVIL ADMIN. CODE OF ILLINOS, AND WITH VIOLATIONS OF SECTION 2605-400 OF THE DEPARTMENT OF STATE POLICE LAW (20 ILCS 2605/2605-400), AND WITH CONTINUING SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF THE FEDERAL CONGRESSIONAL ACTS, THE FEDERAL CONSTITUTIONAL ARTICLES AND AMENDMENTS, AND THE FEDERAL CIVIL RIGHTS STATUTES CITED HEREIN.

(6.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE D. GARTH, CHARGE THE OFFICES OF MR. DAMON T. ARNOLD, DIRECTOR OF THE ILLINOIS DEPARTMENT OF PUBLIC HEALTH, WITH CONTINUING, AND SYSTEMIC, VIOLATIONS OF (20 ILCS 2310/2310-185) CIVIL ADMIN. CODE OF ILLINOIS, AND WITH VIOLATIONS OF SECTION 2605-400 OF THE DEPARTMENT OF STATE POLICE LAW (20 ILCS 2605/2605-400), AND WITH CONTINUING, AND INSTITUTIONAL, VIOLATIONS OF THE CONGRESSIONAL ACTS, FEDERAL CONSTITUTIONAL ARTICLES AND AMENDMENTS, AND VIOLATIONS OF THE FEDERAL CIVIL RIGHTS STATUTES, CITED HEREIN.

(7.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE D. GARTH, CHARGE THE OFFICES OF THE EXECUTIVE INSPECTOR GENERAL, JAMES A. WRIGHT, ESQ., EXECUTIVE INSPECTOR GENERAL, OFFICE OF THE EXECUTIVE INSPECTOR GENERAL FOR THE AGENCIES OF THE ILLINOIS GOVERNOR, WITH CONTINUING AND INSTITUTIONAL VIOLATIONS OF (20 ILCS 2310/2310-185) CIVIL ADMIN. CODE OF ILLINOIS, AND WITH VIOLATIONS OF SECTION 2605-400 OF THE DEPARTMENT OF STATE POLICE LAW (20 ILCS 2605/2605-400), AND WITH THE SYSTEMIC

(8.)

VIOLATIONS OF THE FEDERAL CONGRESSIONAL ACTS, AND VIOLATIONS OF THE FEDERAL CONSTITUTIONAL ARTICLES AND AMENDMENTS, AND VIOLATIONS OF THE FEDERAL CIVIL RIGHTS STATUTES CITED HEREIN.

- (8.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE D. GARTH, CHARGE THE OFFICE OF MRS. DEGUZMAN, OF THE ILLINOIS DEPARTMENT OF PUBLIC HEALTH, WITH SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF THE CITED FEDERAL CONSTITUTIONAL ARTICLES, AMENDMENTS, AND THE CITED FEDERAL STATUTES AND CONGRESSIONAL ACTS, AND WITH CONTINUING SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF (5 ILCS 430/10-10) STATE OFFICIALS AND EMPLOYEES ETHICS ACT.**
- (9.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE D. GARTH CHARGE THE OFFICES OF MR. DAVID HARRIS, OF THE ILLINOIS OFFICES OF FINANCIAL AND PROFESSIONAL REGULATIONS, WITH SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF THE PREVIOUSLY CITED FEDERAL CONSTITUTIONAL ARTICLES, AND AMENDMENTS, FEDERAL STATUTES AND CONGRESSIONAL ACTS, AND WITH THE CONTINUED SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF (5 ILCS 430/10-10) ILLINOIS STATE OFFICIALS AND EMPLOYEES ETHICS ACT.**
- (10.) SYSTEMIC AND INSTITUTIONAL DISCRIMINATION IN THE PROVISION OF FEDERALLY FUNDED SERVICES BASED ON GENDER (SEX), ETHNICITY (RACE), AND THEOLOGY (RELIGION),**
- (11.) THIS COMPLAINT CHARGES MEDICAL MALPRACTICE AGAINST DR. S. KHOSLA (225 ILCS 60/54.6), AND (225 ILCS 60/54.6(e)), WANTON MISCONDUCT, FOR PRACTICING MEDICINE WITHOUT A LICENSE, AND FOR**

(9.)

ABANDONING THE TREATMENT, IN VIOLATION OF THE "SECTION 65-35 OF THE NURSE PRACTICE ACT," AND FAILURE TO REPORT WIDESPREAD HOSPITAL/NURSING HOME BORNE STAPHYLOCOCCUS INFECTIONS, IN THE CASE OF MS. BEATRICE DEMETRICE GARTH. (PLEASE SEE: "PLAINTIFF'S MOTION TO INTRODUCE PHOTOGRAPHS AS EVIDENCE UNDER, F.R.E. 201").

- (12.) THIS COMPLAINT CHARGES MEDICAL MALPRACTICE AGAINST DR MAZJOUB (225 ILCS 60/54.6), (225 ILCS 60/54.6(d)) FOR WANTON MISCONDUCT, AND FOR SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF "SECTION 65-35 OF THE NURSE PRACTICE ACT," FOR PRACTICING MEDICINE WITHOUT A LICENSE, AND FOR ABANDONING THE TREATMENT OF NEUROLOGICAL INJURIES, AND FOR REFUSAL AND FAILURE TO REPORT THE RAMPANT AND WIDESPREAD HOSPITAL/NURSING-HOME BORNE STAPHYLOCOCCUS INFECTIONS, IN THE CASE OF MS. BEATRICE DEMETRICE GARTH. (PLEASE SEE: "PLAINTIFF'S MOTION TO INTRODUCE PHOTOGRAPHS AS EVIDENCE UNDER F.R.E. 201").**

THESE CLAIMS, AND THIS COMPLAINT, AND THESE CHARGES, SEEK TO RECOVER DAMAGES AND TO SECURE EQUITABLE AND OTHER RELIEF UNDER AN ACT OF CONGRESS PROVIDING FOR THE PROTECTION OF CIVIL RIGHTS;

- (13.) TO REDRESS THE DEPRIVATION, UNDER COLOR OF ANY STATE LAW, ET AL., OF ALL RIGHTS, PRIVILEGES AND IMMUNITIES SECURED BY THE**

(10.)

**CONSTITUTION OF THE UNITED STATES (OF AMERICA), AND BY ACTS OF
CONGRESS PROVIDING FOR THE EQUAL RIGHTS OF CITIZENS AND OF ALL
PERSONS WITHIN THE JURISDICTION OF THE UNITED STATES OF
AMERICA;**

**(14.) TO RECOVER DAMAGES FROM ANY PERSON WHO FAILS TO PREVENT
ANY OF THE WRONGS MENTIONED IN SECTION 1985 TITLE 42;**

**(15.) TO RECOVER DAMAGES FOR INJURIES BY ANY ACT DONE IN
FURTHERANCE OF ANY CONSPIRACY MENTIONED IN SECTION 1985 OF
TITLE 42, INCLUDING, BUT NOT LIMITED TO, THE FOLLOWING:**

**(77 ILL. ADM. CODE 560.120): VIOLENT INJURY REPORTING CODE, (77 ILL.
ADM. CODE ss 515.170(a), (b) EMPLOYER RESPONSIBILITY): EMERGENCY
MEDICAL CENTER TRAUMA CODE.**

**(16.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND HIS SISTER AND WARD,
MS. BEATRICE DEMETRICE GARTH, ARE BOTH "INTERESTED PARTIIES," AS
DESCRIBED IN: (5 ILCS 430/5-50(d)); STATE OFFICIALS AND EMPLOYEES
ETHICS ACT, WHICH IS THE STATUTORY AUTHORITY OF THE OFFICE OF THE
EXECUTIVE INSPECTOR GENERAL FOR THE AGENCIES OF THE ILLINOIS
GOVERNOR, AND THE PLAINTIFFS ARE CITIZENS OF THE STATE OF
ILLINOIS AND OF THE UNITED STATES OF AMERICA.**

**(17.) THE PLAINTIFFS CHARGE, CLAIM, AND COMPLAIN THAT, THEY ARE
ENTITLED, BY THEIR CREATOR, AND AS CITIZENS OF THE STATE OF ILLINOIS,**

(11.)

**AND AS CITIZENS OF THE UNITED STATES OF AMERICA, AND BY THE
CONSTITUTION OF THE STATE OF ILLINOIS, AND BY THE CONSTITUTION OF THE
UNITED STATES OF AMERICA, TO THE INALIENABILITIES, THE RIGHTS, THE
PRIVILEGES, THE IMMUNITIES, THE DUE PROCESS OF LAW, AND EQUAL
PROTECTIONS OF THE LAW, WHICH HAVE BEEN VIOLATED, IN WHOLE OR IN
PART, BY THE DEFENDANTS NAMED HEREIN, AND, OR, THEIR SUB-ORDINATES
AND PROXIES.**

28 .SC. SECTION 1443: (1), (2): CIVIL RIGHTS CASES;

**(18.) THE PLAINTIFFS HAVE BEEN DENIED, AND THE PLAINTIFFS CANNOT
ENFORCE, THEIR CIVIL RIGHTS UNDER THE STATE AND FEDERAL LAWS
WHICH PROVIDE FOR THE EQUAL CIVIL RIGHTS OF CITIZENS OF THE
UNITED STATES OF AMERICA.42 U.S.C. ss 1981; EQUAL RIGHTS UNDER
THE LAW.**

**(19.) THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND HIS SISTER AND
WARD, MS. BEATRICE DEMETRICE GARTH, HAVE EXHAUSTED ALL
ADMINISTRATIVE REMEDIES, AND THEY CHARGE SYSTEMIC AND
INSTITUTIONAL VIOLATIONS OF THE PLAINTIFFS' FEDERAL CIVIL RIGHTS
AGAINST, DEFENDANTS, CIRCUIT COURT OF COOK COUNT, DOROTHY
BROWN: CLERK OF THE CIRCUIT COURT, MICHAEL S. DELANEY: ATTORNEY
AT LAW, STEVEN MIJALOVIC: ATTORNEY AT LAW, MRS. ETHEL MAE
SPENCER, MRS. ERNESTINE ALLEN, MR. ELVIE N. GARTH, AND LISA
MADIGAN: ATTORNEY GENERAL FOR THE STATE OF ILLINOIS,**

(12.)

(A) AND, SYSTEMIC AND INSTITUTIONAL VIOLATIONS OF THE EQUAL PROTECTIONS OF THE LAWS CLAUSES OF THE CONSTITUTION OF THE STATE OF ILLINOIS,

(B) THE RIGHT TO REMEDY AND JUSTICE PROVISION OF SECTION (12),

(C) THE NO DISCRIMINATION ON THE BASIS OF SEX (GENDER) PROVISION OF SECTION (18),

(D) THE NO DISCRIMINATION AGAINST THE HANDICAPPED PROVISION OF SECTION (19),

(E) THE ENFORCEMENT OF THE CRIME VICTIM'S RIGHTS OF SECTION (8.1(a)(1))—(10)(d),

(F) THE RIGHT TO PRIVACY, AGAINST SEARCHES, AGAINST SEIZURES, AND AGAINST INTERCEPTIONS, PROVISIONS OF SECTION (6),

(G) THE RIGHT TO ASSEMBLE AND TO PETITION OF SECTION (5),

(H) THE RIGHT OF THE FREEDOM OF SPEECH OF SECTION (4),

(I) THE RIGHT OF RELIGIOUS (THEOLOGICAL) FREEDOM OF SECTION (3),

(J) THE RIGHT OF DUE PROCESS AND EQUAL PROTECTION OF SECTION (2),

(K) THE INHERENT AND INALIENABLE RIGHTS OF SECTION (1),

(L) THE RIGHT TO TRIAL BY JURY OF SECTION (13),

(M) THE RIGHT AGAINST THE IMPOSING OF EX-POST-FACTO-LAWS AND IMPAIRING CONTRACTS PROVISION OF SECTION (16),

(N) THE RIGHT TO INDIVIDUAL DIGNITY OF SECTION (20),

(O)THE RIGHTS OF THE FUNDAMENTAL PRINCIPLES OF SECTION (23),

(P) AND THE RIGHTS RETAINED PROVISIONS OF SECTION (24),

(13.)

**(Q) EVERY PROTECTION, REGULATION, RULE, AND ADMINISTRATIVE
REMEDY, OF WHICH HAS BEEN BRUTALLY VIOLATED BY THE DEFENDANTS
NAMED, AND, OR, THEIR SUB-ORDINATES AND PROXIES.**

42 U.S.C. ss 1983; CIVIL ACTION FOR DEPRIVATION OF RIGHTS.

28 U.S.C. ss 1343: CIVIL RIGHTS AND ELECTIVE FRANCHISE; (a)(1)—(4).

**THE PLAINTIFFS, DR. RABBI K. A. ISRAEL, AND MS. BEATRICE DEMETRICE
GARTH, ARE BOTH MEMBERS IN, AND STUDENTS OF, MOUNT OF OLIVES
TEMPLE SYNAGOGUE JERUSALEM, ISRAEL, AND TEACHER MATISYAHU BEN
YOCHANAN HACHOHEN, AND THE ORTHODOX LEVITICAL TEACHING OF THE
GEOMETRY, THE QUANTUM-PHYSICS, THE LANGUAGES, THE ARCHITECTURE,
THE MATHEMATICS, THE CHEMISTRY, THE SCIENCES, AND THE CULTURES, AND
HAVE BOTH BEEN DILIGENTLY SO FOR MORE THAN TWENTY-FIVE (25) YEARS,
THE ORTHODOXY AND THE THEOLOGY.**

**ARTICLES. (I), (II), (III), (IV), (V), (VI), (VII), OF THE CONSTITUTION OF THE
OF ILLINOIS, AND FOR THE VIOLATIONS THEREOF;**

**THE DEFENDANT AGENCIES, OFFICERS, AND OFFICES, OF THE STATE OF
ILLINOIS, AND THE COUNTY OF COOK, INCLUDING, DAMON T. ARNOLD,
DIRECTOR OF THE ILLINOIS DEPARTMENT OF PUBLIC HEALTH,**

DANIEL BLUTHHARDT, DIRECTOR OF THE ILLINOIS OFFICE OF FINANCIAL AND PROFESSIONAL REGULATIONS, AND JAMES A. WRIGHT, EXECUTIVE INSPECTOR GENERAL, OFFICES OF THE INSPECTOR GENERAL FOR THE AGENCIES OF THE ILLINOIS GOVERNOR, AND THEIR EMPLOYEES ET AL. DEFENDANTS, HAVE ACTED WITH DISCRIMINATION BASED ON THE SUPREMACY OF THEIR CHRISTIAN RELIGION, BIAS, PREJUDICE, INTIMIDATION, HARASSMENT, RETALIATION, AND MALICE, ABUSE, FRAUD, AND WASTE, AND CONTINUE TO ENGAGE IN THE ESTABLISHMENT OF THEIR CHRISTIAN RELIGION AS THE OFFICIAL STATE RELIGION AS A REQUIREMENT FOR THE PLAINTIFFS TO RECEIVE SERVICES FROM THE STATE OF ILLINOIS, AND AS A REQUIREMENT FOR THE PLAINTIFFS TO PARTICIPATE IN FEDERALLY FUNDED PROGRAMS OPERATED BY SAID DEFENDANTS, TO THE DETRIMENT OF THE PLAINTIFFS, TO THE PHYSICAL INJURY OF THE PLAINTIFFS, AND TO THE EMOTIONAL DISTRESS OF THE PLAINTIFFS, AND ALL IN THE NAME OF THE GOVERNOR OF THE STATE OF ILLINOIS, ROD R. BLAGOJEVICH, AND IN THE NAMES OF THE BEFORE CITED AGENCY DIRECTORS.

(A.) THE PLAINTIFFS FURTHER CLAIM AND COMPLAIN THAT A COMPANY LOCATED IN LINCOLNWOOD, ILLINOIS, THAT IS CALLED "E.M.I. CORPORATION," IS THE OWNER OF "BURNHAM HEALTH-FACILITY PROPERTIES, 14500 MANISTEE, BURNHAM, ILLINOIS, " THE INDEPENDENT LIVING CENTER AT WHICH MS. BEATRICE DEMETRICE GARTH WAS ASSAULTED, RAPED, AND KIDNAPPED BY TWO AS YET UNIDENTIFIED EMPLOYEES, ON AUGUST 11, 2007.

(15.)

- (B.) THIS SAME CORPORATION OWNS AND OPERATES THE FACILITY TO WHICH MS. BEATRICE D. GARTH WAS KIDNAPPED, "SPECIALTY SELECT, 5400 SOUTH HOHMAN, HAMMOND, INDIANA," WHERE SHE WAS HELD INCOMMUNICADO FOR MORE THAN SIXTY-FIVE (65) DAYS.
- (C.) THE SAME COMPANY OWNS AND OPERATES "BRENTWOOD SUB-ACUTE CARE, 4500 WEST 95TH. STREET, BURBANK, ILLINOIS," THE FACILITY TO WHICH MS. BEATRICE DEMETRICE GARTH WAS PLACED AS A RESULT OF THE CO-PLAINTIFF, DR. RABBI K. A. ISRAEL, HER BROTHER, HAVING FILED A CIVIL AND CRIMINAL COMPLAINTS CHARGING THAT HIS SISTER, MS. BEATRICE D. GARTH, HAD BEEN KIDNAPPED AND TAKEN BY THE DEFENDANTS OUT OF THE JURISDICTION OF THE STATE OF ILLINOIS, AND THAT SHE HAD BEEN TAKEN OUTSIDE OF THE COUNTY OF COOK IN THE DEFENDANTS' ATTEMPTS TO DESTROY EVIDENCE AND TO DESTROY THE CRIME-SCENE.
- (D.) THE SAME COMPANY OWNS AND OPERATES "ELM-WOOD CARE NURSING HOME, 7733 WEST GRAND AVENUE, ELM-WOOD PARK, ILLINOIS," THE FACILITY TO WHICH MS. BEATRICE DEMETRICE GARTH AS A RESULT OF THE CO-PLAINTIFF, DR. RABBI K. A. ISRAEL, HER BROTHER, HAVING CHARGED THAT THE DEFENDANTS, ATTORNEY MICHAEL DELANEY, ETHEL MAE SPENCER, ERNESTINE ALLEN, ELVIE NELSON GARTH, DOROTHY BROWN, THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, ATTORNEY GENERAL LISA MADIGAN, ATTORNEY STEVEN MIJALOVIC,

ET AL., WERE CONTINUING TO ENDANGER THE LIFE OF MS. BEATRICE DEMETRICE GARTH, IN THE FACT THAT FOR ALL OF THESE MONTHS SHE, MS. BEATRICE D. GARTH HAD NEVER BEEN TREATED IN A HOSPITAL, AND THAT SHE HAD NEVER BEEN TREATED BY A DOCTOR, THAT, AND WHO, WAS NOT ON THE SAME PAY-ROLL OF THE SAME CORPORATION AGAINST WHOM LAWSUITS HAD BEEN FILED, CHARGING CRIMINAL AND CIVIL VIOLATIONS, IN RELATION TO THE ORIGINAL ATTACKS AGAINST MS. BEATRICE DEMETRICE GARTH.

(E.) THE PLAINTIFFS FURTHER CLAIM AND COMPLAIN THAT IN THE ROOM (315) IN WHICH MS. BEATRICE DEMETRICE GARTH HAS BEEN PLACED AT THE "ELMWOOD CARE NURSING HOME," THERE ARE THREE WOMEN PATIENTS. THE TWO OTHER WOMEN PATIENTS ARE ELDERLY WOMEN WHOSE AGES RANGE BETWEEN SEVENTY TO SEVENTY-FIVE YEARS OF AGE. AT THE ENTRANCE WAY TO THE ROOM IS A PLACARD POSTED ON THE OUTSIDE HALL-WAY SIDE OF THE WALL. THE PLACARD STATES THAT ALL OF THE INHABITANTS OF THE ROOM HAVE AN INFECTIOUS AND COMMUNICABLE VIRUS, AND THAT ALL VISITORS SHOULD WEAR FACE-MASKS, ISOLATION-GOWNS, AND GLOVES.

THE FEMALE PATIENT WHOSE BED IS FURTHEST FROM THE DOOR-WAY, AND CLOSEST TO THE WINDOW, IS A CAUCASIAN WOMAN. THE OTHER TWO WOMEN PATIENTS ARE AFRICAN-DESCENDED-AMERICAN WOMEN, INCLUDING MS. B. D. GARTH, WHOM IS 42 YEARS OF AGE.

THE CAUCASIAN WOMAN WHOSE BED IS NEAREST THE WINDOW, AND FURTHEST FROM THE DOOR, HAS APPROXIMATELY TWENTY-ONE TO TWENTY-TWO FEET OF THE SPACE IN THE THIRTY-FOOT-WIDE ROOM. THE TWO AFRICAN-DESCENDED-AMERICAN WOMEN, HAVE BEEN PLACED WITH THEIR BEDS LESS THAN ONE-FOOT APART, AND THE TWO AFRICAN-DESCENDED-AMERICAN WOMEN SHARE APPROXIMATELY SEVEN FEET OF SPACE. (PLEASE SEE; "PLAINTIFFS' MOTION TO INTRODUCE PHOTOGRAPHS AS EVIDENCE, ATTACHMENTS").

IN CONCLUSION, THE CITATIONS: (5 ILCS 430/5-50(d)); "INTERESTED PARTY" MEANS A PERSON OR ENTITY WHOSE RIGHTS, PRIVILEGES OR INTERESTS ARE THE SUBJECT OF, OR, ARE DIRECTLY AFFECTED BY A REGULATORY, QUASI-ADJUDICATORY, INVESTMENT, OR LICENSING MATTER. (THIS IS THE STATUTORY AUTHORITY OF THE ILL. OFFICE OF THE EXECUTIVE INSPECTOR GENERAL.)

VIOLENT INJURY REPORTING CODE; (77 ILL. ADM. CODE 560.120): REPORTING REQUIREMENTS; (a) THE DEPARTMENT SHALL ESTABLISH AND MAINTAIN AN INFORMATION REGISTRY AND REPORTING SYSTEM FOR THE PURPOSE OF DATA COLLECTION ON VIOLENT INJURIES TO PERSONS OF THIS STATE.

DATE: JUNE 30, 2008

RESPECTFULLY SUBMITTED BY:

SIGNED: كيفية ثابتة كايقة DR. Rabbi

DR. RABBI K. A. ISRAEL, A/K/A/

DR. RABBI K. GARTH RICHARDSON,

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